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May 20, 2005

National Organic Standards Board
C/O Arthur Neal
Room 4008-South Building
1400 and Independence Avenue SW
Washington, DC 20250-0001

Dear Mr. Neal:

I am writing in response to the NOSB "Guidance for Interpretation of section 205.239(a)(2) of the National Organic Program, published for public comment on March 22, 2005.

I am against certain portions of the language of Sections (A) and (C), and I am in favor of the language in section (B).

I am concerned financially about how the restrictions of sections A and C could slow down the growth of organic dairy in my area, or even lead to a loss of organic dairies. A restrictive section that hurts organic dairies would have a big negative impact on my ability to sell high quality organic forage crops to my dairy customers. I want to see my business grow as the number of organic dairies grows, and I am very worried that this clause would hurt both myself and other organic forage growers.

In Section (A), I am against two parts of the wording. First, I disagree with the specific numerical requirements for 30% dry matter intake on a daily basis during the growing season but not less than 120 days. My farm grows organic alfalfa and barley (the farm ground on this ranch is approximately 5,000 acres), which I supply to several different organic dairies. In my direct experience as an organic farmer, there are many different climates, soils and farm management plans. Individual farms and organic certifiers should be given the interpretive freedom to develop a good organic farm plan that upholds organic standards and works well in the specific location of the farm. That's what I do with my organic farm and with my certifier. I would never dictate arbitrary

numbers to another organic farmer, nor would I want them to give those arbitrary numbers to me.

Second, I disagree with the five reporting requirements of this section. Organic farm plans already require extensive reporting verification of how the farm is to be managed. I don't think that additional reporting is useful or beneficial either to farmers or to the organic program. These five requirements are not workable, nor are they even measurable. What's more, they impose additional record-keeping burdens on a farm plan that is already filled with time-consuming reporting requirements.

In Section (C), I disagree with using the National Resources Conservation Service for regulating dairy animal grazing. In my county, and in my experience, NRCS is only used for beef cattle and not for dairy. The livestock people I talk to say the NRCS is not a good way to manage dairy pasture, where animals travel back and forth to a barn several times a day, but is designed for cow-calf operations where animals roam across the range for weeks or months at a time.

Section (B) seems OK to me, since dairy animals should be outside as much as possible and should have access to pasture.

Thank you for your time.

Sincerely,

Rodney Ray Gonsales
South Cove Ventures LLC